## Exhibit E

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

JANELLE HILL AND WILLIAM HILL, \*
INDIVIDUALLY AND AS NEXT \*
FRIENDS OF SAVANNAH A. HILL, \*

\*

Plaintiffs, \* Civ. Action No. 1:09-cv-00463-CMH-TRJ

\*

V.

\*

SANOFI-AVENTIS U.S., INC.,

\*

Defendant. \*

## MEDCON, INC.'S PROPOSED MOTION FOR PROTECTIVE ORDER

Medcon, Inc. ("Medcon"), pursuant to Fed. R. Civ. P. 26(c), hereby requests that this Court enter a Protective Order authorizing the disclosure of the confidential Settlement Agreement between Plaintiff Janelle Hill and Defendant Sanofi-Aventis U.S., Inc. in relevant part such that this Court's Order of February 20, 2013 can be effectuated and that Medcon's valid contract, supported by an artibration award, can be paid.

A memorandum in support of this Motion is attached, as is a copy of the Proposed Order.

Respectfully submitted,

By: <u>/s/</u>

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the <u>30th</u> day of July 2013, I electronically transmitted the attached and foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Helen Cohn Needham John Benjamin Raftery Kenneth Edward Labowitz Mary Catherine Zinsner Spencer Dean Ault Stephen Dennis Otero

By: /s/
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